

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

VALASSIS NSA

Docket No. MC2012-14

Docket No. R2012-8

RESPONSE OF The Cumberland Times-News TO NOTICE OF INQUIRY NO. 1

An introduction that identifies the commenting newspaper (or newspaper company).

We submit this declaration in support of NAA's Response to Notice of Inquiry No. 1

The Cumberland Times-News would like to reiterate here its opposition to the Valassis NSA and the harm that it would cause to the market for the distribution of preprint advertising inserts. Newspapers compete in this market with direct mailers such as Red Plum. The customers are the retailer advertisers; the vendors are newspapers and direct mailers.

Response To Questions

1. For fiscal year 2010, we estimate that advertising inserts for durable and semi-durable goods from national retailers represented \_23\_% of total advertising revenues (including ROP, classified, and digital advertising), 25\_% of total print advertising revenue, and \_\_92\_% of total preprint advertising revenue.

2. For fiscal year 2011, we estimate that advertising inserts for durable and semi-durable goods from national retailers represented 23\_\_% of total advertising revenues (including ROP, classified, and digital advertising), 25\_\_% of total print advertising revenue, and \_92\_\_% of total preprint advertising revenue.

3. The Times-News distributes Total Market Coverage products to non-subscribers. These TMC products are distributed every Thursday and contain advertising inserts from grocery stores, cable companies, fast food, etc. While TMCs may contain ad inserts from national retailers of durable and semi-durable goods, most of these types of ad inserts are distributed in newspapers' Sunday editions and are an important source of revenue for newspaper journalism in our communities.

.....For fiscal year 2011, we estimate that we distributed \_52\_ packages of TMC advertising inserts displaying durable and semi-durable goods from national retailers via the Postal Service and \_\_\_\_0\_\_\_\_ packages via private delivery carriers or through other delivery methods.

4. For fiscal year 2010, we estimate that we mailed approximately 52 packages of TMC product for which we paid the Postal Service approximately \$ 145,535.

5. For fiscal year 2011, we mailed approximately 52 packages of TMC product for which we paid the Postal Service approximately \$142,759.

6. We estimate that the Postal Service will lose approximately \$145,000 from our mid-week TMC postage if the Valassis NSA is approved.

7. The Times-News is a small community newspaper with approximately 100 employees and our newspaper distributes advertising for firms that sell durable and semi-durable good nationally. If the Valassis NSA proposal is allowed our news paper will suffer a dramatic loss in revenues which will result in a number of employees losing their jobs, and our readers would suffer from a reduced story count and page count.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 21, 2012..

Larry E. Effingham  
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